UNITED STATES DISTRICT COURT

DISTRICT OF RHODE ISLAND

NANCY A. BUYNTON AND	
PATRICIA BEEKES	
Plaintiffs	
Vs.	Civil Action No.
FEDERAL HOUSING FINANCE	
AGENCY, FEDERAL NATIONAL	
MORTGAGE ASSOCIATION, AND	
SANTANDER BANK, N.A.	
Defendants	

PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs move for a temporary restraining order and preliminary injunction enjoining Defendants Federal Housing Finance Agency ("FHFA") and the Federal National Mortgage Association ("Fannie Mae") from evicting Plaintiffs and from selling or otherwise disposing of Plaintiffs' primary residence located at 4 Cassisi Court, North Providence, RI pending further order of the Court. The eviction action is currently pending in Rhode Island District Court, case number 3CA-2015-1890, and has been scheduled for a **trial on August 25, 2015**. However, Plaintiffs have a substantial likelihood of success of prevailing on their legal claims against FHFA and Fannie Mae. This motion is supported by a memorandum of law, the declaration of Nancy Boynton, and the exhibits attached to the complaint.

WHEREFORE, Plaintiffs respectfully request that the court issue a temporary restraining order and preliminary injunction.

Respectfully submitted,

Nancy A. Boynton and Patricia Beekes By Their Attorneys,

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Dated: August 20, 2015

CERTIFICATE OF SERVICE

This is to certify that on August 20, 2015, I served a copy of the Complaint,

Motion for Temporary Restraining Order and Preliminary Injunction, Memorandum of Law,

Declaration of Nancy Boynton by email to the following counsel:

For FHFA and Fannie Mae: Samuel Bodurtha, Esq. Hinshaw & Culbertson, LLP 321 South Main Street, Suite 301 Providence, RI 02903

For Santander Bank, N.A. Brett Edmonds, Esq. Shechtman Halperin Savage, LLP 1080 Main Street Pawtucket, RI 02861

/s/ Jeffrey C. Ankrom, Esq. Jeffrey C. Ankrom, Esq.